

September 9, 2021

Hon. John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

To file & submit the  
Rule 26 (f) report extended  
30 days after Shores Europe  
is served. So ordered.

Re: *Sobel Network Shipping Co., Inc. v. Shores Global, LLC et al.*, Civil Action No. 1:21cv04320, Motion to Continue the Deadline to Submit Rule 26(f) Report.

Dear Judge Koeltl,

9/9/21 Dr. G. Koeltl  
U.S.D.J.

As evidenced by the signature of counsel below, Plaintiff Sobel Network Shipping Co., Inc. hereby requests that the Court continue the deadline for the Parties to submit a Rule 26(f) report.

On July 9, 2021, Plaintiff and Defendant Shores Global, LLC filed a Joint Motion to Continue the Initial Case Management Conference and Deadline to Submit the Rule 26(f) Report. (*See* D.E. 14). The Court granted the Joint Motion to Continue and set the deadline to submit a Rule 26(f) Report to September 10, 2021. (*See* D.E. 15). The Court ordered that the initial case management conference was canceled until the Court reviewed the Rule 26(f) Report. (*See id.*) Plaintiff sought service of Defendant Shores Europe, ApS via Federal Rule of Civil Procedure 4(f)(2)(c)(ii). (*See* D.E. 13). In August, Plaintiff received confirmation that delivery on Defendant Shores Europe, ApS was not executed using that method of service. (*See* D.E. 20). Therefore, to date, Defendant Shores Europe, ApS has not been served. On September 7, 2021, Plaintiff filed a Motion for Leave to serve Defendant Shores Europe, ApS pursuant to Fed. R. Civ. P. 4(f)(3) and an accompanying Memorandum of Law in Support. (*See* D.E. 21, 22).

As a result of the events set forth above, Plaintiff respectfully seeks a continuance and extension of the Rule 26(f) deadline. The Parties have requested one extension thus far in this litigation, on July 9, 2021. (*See* D.E. 14). Continuing the Rule 26(f) deadline in this case will not

affect other scheduled dates. Plaintiff's counsel has apprised counsel for Defendant Shores Global, LLC of the filing of this letter motion.<sup>1</sup>

Accordingly, Plaintiff moves the Court for an Order extending the deadline for the Parties to submit a Rule 26(f) report by (i) at least thirty (30) days, (ii) until the Court rules on Plaintiff's Motion for Leave to Serve Shores Europe, ApS Pursuant to Rule 4(f)(3), or (iii) until Shores Europe, ApS is served and can participate in a Rule 26(f) conference.

Respectfully submitted,

/s/ Aron Z. Karabel  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on September 9, 2021, a true and correct copy of the foregoing was served by the Court's ECF system upon the following:

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*Counsel for Shores Global, LLC*

/s/ Aron Z. Karabel

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<sup>1</sup> Plaintiff's counsel reached out to counsel for Defendant Shores Global, LLC's counsel on September 8, 2021 and September 9, 2021 concerning the events set forth herein. Plaintiff's counsel did not receive a response in opposition or approval of this letter motion.